



# DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.  
GOVERNOR

EDWARD O. SULLIVAN  
COMMISSIONER

S.D. WARREN COMPANY	)	DEPARTMENTAL
SOMERSET COUNTY	)	FINDINGS OF FACT AND ORDER
SKOWHEGAN, MAINE	)	AIR EMISSION LICENSE
A-19-71-W-M	)	AMENDMENT #14

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality Control, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

- ~~1. S.D. Warren Company, Somerset Operations in Skowhegan (S.D. Warren), Maine was issued Air Emission License #2152 on January 26, 1983.~~
  - ~~2. S.D. Warren's Air Emission License was subsequently amended on July 9, 1986, September 21, 1987, January 20, 1989, August 23, 1989, January 9, 1990, June 14, 1990, May 14, 1992, July 7, 1992, January 10, 1994, on March 25, 1994, on September 29, 1994, on April 4, 1995, and on June 7 1995. In addition S.D. Warren's licenses were transferred from S.D. Warren a subsidiary of Scott to S.D. Warren Company on December 20, 1994.~~
  - ~~3. S.D. Warren has requested a minor revision to their Air Emission License to modify the operating requirements and better describe the function of the opacity monitor located on the #2 Power Boiler.~~
- ~~The monitor is located after the ESP and prior to the SO<sub>2</sub> wet scrubber. S.D. Warren has proposed that since the monitor is not a compliance monitor the license should clearly state that the monitor shall be used by the boiler operators as an indicator of ESP effectiveness only. In addition, S.D. Warren has proposed that due to the location, S.D. Warren has had difficulty in maintaining the monitor to meet the requirements of 40 CFR, Part 60 Appendix B and therefore requests that the monitor shall be operated in accordance with the Somerset Plant's QA/QC plan.~~
- ~~The Bureau of Air Quality Control has determined that a minor revision to clearly state that the monitor shall be used by the boiler operators as an indicator of ESP effectiveness only is acceptable since the monitor was not intended to be a compliance monitor.~~

*Serving Maine People & Protecting Their Environment*

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4. S.D. Warren has requested a minor revision to their Air Emission License to summarize and identify VOC RACT requirements which demonstrate compliance with Chapter 134 Section 3(A), Option (D).

**RACT for VOC Emissions**

S.D. Warren operates the following sources which are eligible to achieve compliance with VOC RACT pursuant to Chapter 134, Option (D) of Section 3(A), as described below:

- a. Bleach Plant
- b. Waste Water Treatment Plant
- c. Pulp Stock Washer Systems and Pulp Liquor Storage Tanks
- d. Digester System, Multiple Effect Evaporator System, Condensate Stripper Systems, Smelt Tanks #1 and #2, and Lime Kiln

Bleach Plant

S.D. Warren is required, pursuant to Chapter 122, to collect emissions from the Bleach Plant and have the chlorine and chlorine dioxide emissions controlled by the Bleach Plant Scrubber System. Total S.D. Warren Bleach Plant chlorine and chlorine dioxide emissions after control by the wet scrubber systems are each limited to 3.0 lb/hr. As a result, some of the VOC emissions from the Bleach Plant are also collected and controlled by Bleach Plant Scrubber System.

The control of emissions from the Bleach Plant by the Bleach Plant Scrubber System which complies with Chapter 122 for the control of chlorine and chlorine dioxide emissions is therefore determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the Bleach Plant are not feasible at this time.

Waste Water Treatment Plant

S.D. Warren is required by Federal regulation to comply with their National Pollution Discharge Elimination System (NPDES). By complying with their NPDES permit, VOC emissions from S.D. Warren's Waste Water Treatment Plant are controlled and thus is determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the Waste Water Treatment Plant are not feasible at this time.

Pulp Stock Washer Systems and Pulp Liquor Storage Tanks

VOC emissions from the Pulp Stock Washer Systems and Pulp Liquor Storage Tanks are currently collected and incinerated within the Recovery Boiler or within the #1 Power Boiler and thus is determined to be meeting VOC RACT. The Department has determined that additional VOC controls



for the Pulp Stock Washer Systems and Pulp Liquor Storage Tanks are not feasible at this time.

Digester System and the Multiple Effect Evaporator System

S.D. Warren is required by Chapter 124 to collect emissions from the Digester System and the Multiple Effect Evaporator System. The total reduced sulfur (TRS) emissions from these sources are to be collected and incinerated within the Lime Kiln, the Recovery Boiler, or the #1 Power Boiler. As a result, VOC emissions from the Digester System and the Multiple Effect Evaporator System are also collected and incinerated within the Lime Kiln, the Recovery Boiler, or the #1 Power Boiler.

The control of VOC emissions from the Digester System and the Multiple Effect Evaporator System by the Lime Kiln, the Recovery Boiler, or the #1 Power Boiler which complies with Chapter 124 for the control of TRS emissions is therefore determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the Digester System and the Multiple Effect Evaporator System are not feasible at this time.

Condensate Stripper Systems

S.D. Warren has 2 Condensate Stripping Systems, an air stripping and a steam stripping system. The air stripper is used to strip a portion of the foul evaporator condensate. The steam stripper is used primarily to strip the digester relief condensate. Materials stripped from these condensate streams are incinerated in either the Recovery Boiler, the #1 Power Boiler, or the Lime Kiln. As a result, VOC emissions are also collected and incinerated within the Recovery Boiler, the #1 Power Boiler, or the Lime Kiln and thus is determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the Condensate Stripping Systems are not feasible at this time.

Smelt Tanks #1 and #2

S.D. Warren is required by license to control emissions from the Smelt Tanks #1 and #2. The particulate emissions from these sources are each controlled by a wet scrubber system. As a result, some of the VOC emissions from the Smelt Tanks are also controlled. The control of emissions from the Smelt Tanks by the wet scrubber systems which complies with the license for the control of particulate emissions is therefore determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the Smelt Tanks #1 and #2 are not feasible at this time.

Lime Kiln

S.D. Warren is required to maintain adequate combustion conditions within the Lime Kiln to meet a TRS emissions limit of 20 ppmv corrected to 10% O<sub>2</sub> on a dry basis, as required by Chapter 124. As a result, VOC emissions from the Lime Kiln is also controlled by maintaining adequate combustion conditions.

The control of VOC emissions from the Lime Kiln by maintaining adequate combustion conditions which complies with Chapter 124 for the control of TRS emissions is therefore determined to be meeting VOC RACT. The Department has determined that additional VOC controls for the Lime Kiln are not feasible at this time.

ORDER

~~Based on the above Findings and subject to conditions listed below the Department concludes that the emissions from this source:~~

- ~~\_\_\_\_\_ will receive Best Practical Treatment,~~
- ~~\_\_\_\_\_ will not violate applicable emission standards,~~
- ~~\_\_\_\_\_ will not violate applicable ambient air quality standards in conjunction with emissions from other sources.~~

The Department hereby grants Air Emission License Minor Revision A-19-71-W-M, subject to ~~the conditions found in Air Emission License #2152, in the following amendments:~~

- ~~\_\_\_\_\_ A 19 71 A A, \_\_\_\_\_ A 19 71 B A, \_\_\_\_\_ A 19 71 E A, \_\_\_\_\_ A 19 71 F A,~~
- ~~\_\_\_\_\_ A 19 71 G A, \_\_\_\_\_ A 19 71 I A, \_\_\_\_\_ A 19 71 K A \_\_\_\_\_ A 19 71 L M,~~
- ~~\_\_\_\_\_ A 19 71 N A, \_\_\_\_\_ A 19 71 R M, \_\_\_\_\_ A 19 71 S M, \_\_\_\_\_ A 19 71 U A,~~
- ~~\_\_\_\_\_ A 19 71 V M, \_\_\_\_\_ and in the following conditions:~~

~~The following shall replace Condition (aa)6) of Air Emission License A-19-71-K-A Amendment #9:~~

- ~~\_\_\_\_\_ (aa) 6) An ESP performance indicator shall be located on the #2 Power Boiler, after the ESP and prior to the SO<sub>2</sub> wet scrubber. A smoke density trend shall be used by the boiler operators as an indicator of ESP effectiveness. The ESP performance indicator shall be operated in accordance with the Somerset Plant's QA/QC plan, shall not be used for compliance purposes, and shall not be subject to Chapter 117.~~



S.D. WARREN COMPANY  
SOMERSET COUNTY  
SKOWHEGAN, MAINE  
A-19-71-W-M

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5 AMENDMENT #14

The following are new Conditions:

- (17) S.D. Warren shall meet the following VOC RACT requirements:
- a. S.D. Warren shall not utilize, without a prior license revision, sodium hypochlorite as a primary bleaching agent in the Bleach Plant.
  - b. S.D. Warren shall comply with the terms and conditions of their NPDES permit.
  - c. S.D. Warren shall collect and control emissions from Pulp Stock Washer Systems as required by Chapter 124 and Pulp Liquor Storage Tanks by incineration within the Recovery Boiler or within the #1 Power Boiler.
  - d. S.D. Warren shall collect and control emissions from the Digester System and the Multiple Effect Evaporator System for TRS control as required by Chapter 124.
  - e. S.D. Warren shall collect and control emissions from the Condensate Stripping Systems by incineration within the Recovery Boiler, the #1 Power Boiler, or the Lime Kiln as required by Chapter 124.
  - f. S.D. Warren shall operate the Smelt Tank Scrubbers when the Smelt Tank #1 and/or #2 are in operation.
  - g. S.D. Warren shall meet a TRS emissions limit of 20 ppmv corrected to 10% O<sub>2</sub> on a dry basis, as required by Chapter 124 from the Lime Kiln.
- (18) This license shall expire concurrently with Air Emission License #2152.

DONE AND DATED IN AUGUSTA, MAINE THIS 4th DAY OF October 1995.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

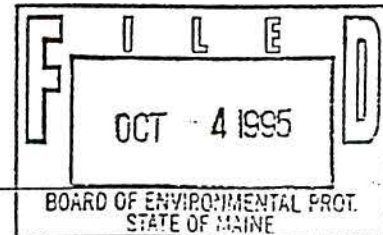
BY: *Edward O. Sullivan*  
EDWARD O. SULLIVAN

PLEASE NOTE THE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application August 31, 1995

Date of application acceptance August 31, 1995

Date filed with the Board of Environmental Protection \_\_\_\_\_



This Order prepared by Kim Hibbard, Bureau of Air Quality Control